

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF NORTH CAROLINA**

United States of America,

Plaintiff;

v.

Terry Johnson, in his official capacity as
Alamance County Sheriff,

Defendant.

No. 12-cv-1349

UNITED STATES' MOTION TO SEAL

UNITED STATES' MOTION TO SEAL

On April 23, 2013, the Court entered the Parties' Joint Confidentiality and Protective Order, ECF No. 18 ("Confidentiality Order"). Pursuant to that Order, the United States now moves this Court to file under seal two exhibits attached to its Reply in Support of its September 17, 2013, Motion to Seal, ECF No. 49, and to accept the filing of a redacted version of the United States' Reply, ECF No. 64.

The United States seeks to seal the following documents: Exhibit A, a declaration from Dr. Laura Roselle; and Exhibit B, two news articles identifying Dr. Roselle's daughter. These documents contain personally identifiable information and are designated "confidential" pursuant to the Confidentiality Order, ¶ 3(b).

In addition, the United States asks the Court to accept the filing of a redacted version of the United States' Reply in Support of its Motion to Seal, ECF No. 64, because the Reply cites information that has been designated confidential.

According to the procedures contained in the Protective Order, *see id.* at ¶ 8, the United States respectfully requests that this Court file the above referenced materials under seal.

Respectfully submitted,

JONATHAN M. SMITH
Chief
Special Litigation Section

TIMOTHY D. MYGATT
Special Counsel

s/ Michael J. Songer
MICHAEL J. SONGER
DC Bar Number: 975029
AARON FLEISHER
Attorneys
United States Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
Tel: (202) 514-6255
Fax: (202) 514-4883
michael.songer@usodj.gov

Attorneys for the United States

CERTIFICATE OF SERVICE

I certify that the foregoing United States' Motion to Seal was served through the electronic filing service on October 25, 2013, which will provide notice to all registered parties.

s/ Michael J. Songer
MICHAEL J. SONGER
Attorney for the United States